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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY THURTLE,

Defendant.

Case No. 2:24-cr-00229-APG-NJK

**Government's Notice of Expert  
Testimony**

The United States of America, by and through Sigal Chattah, Acting United States Attorney, and Lauren Ibanez, Assistant United States Attorney, hereby gives notice of the following Expert Testimony pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G).

**Peter Beckwith – FBI Special Agent**

The United States, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, hereby provides to the defendant a written summary of the testimony of the Federal Bureau of Investigation (FBI) Special Agent Peter Beckwith. Special Agent Beckwith who is an expert in the interstate nexus of firearms, whom the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial, including as required by the rule, the witness's opinions, the basis and reasons for

1 those opinions, and the witness's qualifications and previous testimonies.

2 **The Witness's Qualifications and Testimonies**

3 The qualifications to testify are contained within his Curriculum Vitae, attached as  
4 Exhibit 1. Special Agent Beckwith has not published or authored any articles within the  
5 previous 10 years.

6 **The Witnesses Opinions**

7 The government expects that Special Agent Beckwith will testify that based on this  
8 training, education, and experience, as well as his research, observations, and analysis, that  
9 the Springfield Armory, Model Hellcat, 9MM pistol bearing serial number BY257031, that  
10 was recovered in this case was not manufactured in the state of Nevada and traveled in  
11 interstate commerce. Special Agent Beckwith is also expected to testify that the Springfield  
12 Armory, Model Hellcat, 9MM pistol is a firearm designed to expel a projectile by the action  
13 of an explosive. Special Agent Beckwith is further expected to testify that the make and  
14 model of the firearm listed above is not manufactured in the state of Nevada and that any  
15 make and model firearm listed above located in Nevada would have traveled in interstate  
16 commerce. Finally, Special Agent Beckwith is expected to testify regarding the  
17 methodologies he employed in his analysis and any other area that is within his area of  
18 expertise which is helpful to the jury's comprehension of relevant issues and facts in this  
19 case. A complete statement of the opinions that the government will elicit from Special  
20 Agent Beckwith during its case-in-chief, and the bases and reasons for them, are attached as  
21 Exhibit 2.

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1 **The Basis and Reasons for the Witness's Opinions**

2 Special Agent Beckwith's opinions are based on his personal examination of the  
3 results which were produced, as well as his training, education, experience and expertise as  
4 an FBI Special Agent. Special Agent Beckwith's expert opinions, and the basis for those  
5 opinions, are set forth more in Exhibit 2.

6  
7 Reviewed and approved by:

  
8 PETER BECKWITH  
9 FBI SPECIAL AGENT

10 **REQUEST FOR RECIPROCAL DISCOVERY**

11 Pursuant to Rule 16 (b)(1)(C), the United States respectfully requests reciprocal  
12 discovery in the form of notice of any possible experts, a description of their  
13 qualifications, and a summary of any possible expert testimony to be elicited or given by  
14 defense witnesses at trial.

15 DATED: August 4, 2025

16 SIGAL CHATTAH  
Acting United States Attorney

17 /s/ Lauren Ibanez

18 LAUREN IBANEZ  
19 Assistant United States Attorney  
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